

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Bob Cajune, Cynthia Cajune,
Kalynn Kay Aker, Lion 194,
John Doe #1, Mary Roe #1-7, N.W.,
a minor, by Kalynn Kay Aker,

Case No. 21-cv-01812 (ADM/BRT)

Plaintiffs,

v.

MOTION TO DISMISS

Independent School District 194,
and Michael Baumann in his
official capacity as Superintendent of
Independent School District 194,

Defendants.

TO: Plaintiffs Bob Cajune, Cynthia Cajune, Kalynn Kay Aker, LION 194, John Doe #1, Mary Roes #1-7, and N.W., a minor, by Kalynn Kay Aker, by and through their attorneys, Douglas P. Seaton and James V.F. Dickey, Upper Midwest Law Center, 8421 Wayzata Blvd., Suite 300, Golden Valley, MN 55426.

PLEASE TAKE NOTICE that Defendants Independent School District 194 and Michael Baumann in his official capacity as Superintendent of Independent School District 194, hereby move to dismiss Plaintiffs' Complaint pursuant to Federal Rules of Civil Procedure 12(c), with a hearing date set for December 21, 2021 at 10:00 a.m.

This motion will be based upon the files, records and proceedings herein, including Defendants' memorandum of law and supporting documents, which will be filed and served in accordance with the Federal Rules of Civil Procedure, the Local Rules for the District of Minnesota, and the parties' September 16, 2021 Stipulation for Cross-Briefing Schedule, if the Stipulation and Proposed Order are approved by the Court.

**RUPP, ANDERSON, SQUIRES
& WALDSPURGER, P.A.**

Dated: September 21, 2021

By: /s/ Trevor S. Helmers

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